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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

JANE DOE, INDIVIDUALLY AND ON  
BEHALF OF A CLASS OF SIMILARLY  
SITUATED INDIVIDUALS,

Plaintiff,

v.

EATING RECOVERY CENTER LLC,  
Defendant.

Case No. 3:23-cv-05561-VC (LJC)

**STIPULATION TO AMEND  
PROTECTIVE ORDER**

Judge: Hon. Lisa J. Cisneros

Pursuant to Civil Local Rule 7-12, Plaintiff Jane Doe and Defendant Eating Recovery Center LLC, by and through their respective counsel of record, respectfully submit this Stipulation to Amend the Protective Order.

WHEREAS, on August 14, 2024, the parties filed a Stipulated Protective Order and [Proposed] Order (ECF No. 46);

WHEREAS, on August 20, 2024, this Court granted the Stipulated Protective Order; (ECF Doc. No. 49);

WHEREAS, due to concerns raised a Non-Party (as the term is defined in the Protective Order), the Parties wish to amend the Protective Order to ensure the Protective Order provides clear and sufficient protections for documents produced by a Non-Party as “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY.”

WHEREAS, the Parties have agreed to amend the first sentence of Section 9(a) of the Protective Order to include “or ‘HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” so that it reads:

(a) The terms of this Order are applicable to information produced by a Non-Party in this action and designated as “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY.”

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, between Plaintiff and Defendant, by and through their respective counsel, that:

1. The first sentence of Section 9(a) of the Protective Order shall be amended to read as follows:

(a) The terms of this Order are applicable to information produced by a Non-Party in this action and designated as “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY.”

**IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

DATED: November 1, 2024 /s/ Timothy Z. LaComb  
Attorneys for Plaintiff

DATED: November 1, 2024 /s/ James F. Monagle  
Attorney for Defendant

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED: November 1, 2024

  
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LISA J. CISNEROS  
United States Magistrate Judge

**FILER'S ATTESTATION**

I, Timothy Z. LaComb, am the ECF user whose identification and password are being used to file this Stipulated Protective Order. In compliance with L.R. 5-1(i)(3), I hereby attest that concurrence in the filing of this Stipulation to Amend Protective Order has been obtained from each of the other signatories.

Date: November 1, 2024

/s/ Timothy LaComb  
\_\_\_\_\_  
Timothy Z. LaComb

**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that, on November 1, 2024, I served a true and correct copy of the foregoing Stipulation to Amend Protective Order via CM/ECF on all parties and counsel of record.

/s/ Timothy LaComb  
Timothy Z. LaComb